

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS **EASTERN DIVISION**

RECEIVED

JUN 102016 EAA C-C-VO THOMAS G. BRUTON T

Matthew Brown-Turner	CLERK, U.S. DISTRICT COUR
(Enter above the full name of the plaintiff or plaintiffs in this action)	16cv6126 Judge John W. Darrah Magistrate Judge Susan E. Cox PC11
Tom Dart	Case (To be supplied by the Clerk of this Count)
Cook County Jail	
Sorgent Houston	
Officer Leon Officer S. Howard 111	
(Enter above the full name of ALL	
defendants in this action. <u>Do not</u> use "et al.")	
CHECK ONE ONLY:	
COMPLAINT UNDER TO U.S. Code (state, county, or	HE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983 or municipal defendants)
COMPLAINT UNDER TO 28 SECTION 1331 U.S. C	HE CONSTITUTION ("BIVENS" ACTION), TITLE Code (federal defendants)
OTHER (cite statute, if kn	nown)
BEFORE FILLING OUT THIS COMPL	AINT, PLEASE REFER TO "INSTRUCTIONS FOR

FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.

I.	Plain	tiff(s):
	A.	Name: Matthew Brown-Turner
	B.	List all aliases:
	C.	Prisoner identification number: 20/30622117
	D.	Place of present confinement: <u>Cook Count Jail</u>
	E.	Address: P. U. BOX 089002 Chicago, Il 60608
	numb	ere is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. er, place of confinement, and current address according to the above format on a stee sheet of paper.)
П.	(In A position	below, place the full name of the first defendant in the first blank, his or her official on in the second blank, and his or her place of employment in the third blank. Space to additional defendants is provided in B and C .)
	A.	Defendant: Tom Dart
		Title: Sherrif
		Place of Employment: Cook County Sherrif's Office
	B.	Defendant: Cook County Jail
		Title: Cook County Department of Corrections
		Place of Employment:
	C.	Defendant: Commander Johnson - Div. 10
		Title: Sherrif
		Place of Employment: <u>C.C.D.O.C</u> Div. 10
	a.c	

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II.	Defendants (cont.)
D.	Defendant: Sargent Houston Title: Sherrif Place of Employment: C.C.D.O.C Dir.10
	litle: Sherrit
	Place of Employment: C.L.V. U.C VIV. 10
ε.	Defendant: Officer Leon Title: Sherrif Place of Employment: C.C.D.O.C Div. 10
	Title: Sherrif
	Place of Employment: C.C.D.O.C Div. 10
	Defendent Officer & House of 111
	Title Cherrif
	Defendant: Officer S. Howard III Title: Sherrif Place of Employment: C.C.D.O.C Div. 10
4 T	

Approximate date of filing lawsuit:
List all defendants:
Court in which the lawsuit was filed (if federal court, name the district; if state coname the county):
Name of judge to whom case was assigned:
Basic claim made: <u>None</u>
Disposition of this case (for example: Was the case dismissed? Was it appeal Is it still pending?): $NORE$

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. COPLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

2)

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On April 7th 2016 8:30 p.m in Cook County Jail
Division 10 a big argument exupted between a
group of inmates mere seconds before a fisht would
have broke out on 3-C, an all-available was called
by our unit Officer Leon. Commander Johnson and
Sargent Houston responded and Officer Leon Said
it was a false alarm without properly investigateing the matter which led to the incident on April
8th the following morning.

On the morning of April 8th 2016 in Division 10 on 3-C Officer S. Howard III opened our cells and sat in the bubble, while different inmates grouped up. Then a fight broke out. Officer S. Howard III didn't call for back up until two more fights broke out. At this time is when a couple of inmates ran up on me and jumped me and stabbed me 3 times, once in my left arm, once on the bottom of my neck and

once in my back on my spinal cord. The whole unit
was in a ruckus of confusion for at least 20 minutes
while a couple of dozens of officers watched the groups
of people lighting before they decided to run in a
Spray people with pepper sprayed. At this time I was
pepper sprayed and hand cuffed to the back and
placed on the bench on the unit. The officers
handling the situation let a inmate that I
don't know his name & Kick me in the face
and knock me off the bench after I was sprayed
and handcusted. Tom Dart is over the Cook
County Jail and should showe them the proper
Precedure to better protect us from violence and the
use of weapons,

V.	Relief:
	State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.
Pu	nitive and monetary damages in the sum of 0,000 for emotional and physical pain.
VI.	The plaintiff demands that the case be tried by a jury. YES NO
	CERTIFICATION
	By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.
	Signed this 2 day of May, 20 16
	Matchew Brown-Surner
	(Signature of plaintiff or plaintiffs) Matthew Brown - Turner
	(Print name) 20130622117
	(I.D. Number)
	P.O. Box 089002 Chicago, Il
	60608
	(Address)



COOK COUNTY SHERIFF'S OFFICE (OFICINA DEL SHERIFF DEL CONDADO DE COOK) INMATE DISCIPLINARY REPORT (INFORME DISCIPLINARIO INTERNO)

INCIDENT	REPO	RT NO.	CONTR	OL NUMBER		ir number	FBI N	FBI NUMBER SID NUMBER		INMATE ID NUMBER		
DIV10-2	10-2016-5479 N/A			1513707		IL	_50233140	0480894				
					INMATE INFO	RMATI	ON					
Inmate's Name (Print) (Nombre del recluso Imprimir): Matthew Brown-Turner							Jnit(Division/unidad): ivision 10	Inmate's Living Un vida): In-(nit(Unidad de Cell			
						INFRACTION IN	ORM <i>A</i>	ATION				
□ VERBAL WARNING Date of Infraction: □ FORMAL CHARGE 4/8/2016				Time of Infraction: Location of Infraction 10:15 AM DIVISI				(Lugar de la Infracccion): ION 10	Restitution Form	n Attached:		
NUI	MBER							CHARGE				
2	207		Fight	ting								
2	209		Gang	g Activity								
3	14		Partic	cipation in a	Riot							
4	80		Inciti	ng a Riot							·	
DNA						VICTIM / WIT	NESS II	VFORMAT	ION			
Victim		Inmate				ID#:						
Witness		Staff	A 0	ther: Participant	<u> </u>	Star #:				Edward ROBERSC	ON	
Victim		Inmate	- ^	ub D		ID#:						
☐ Witness ☐ Victim	<u> </u>	Staff Inmate	☑ ∘	ther: Participant		Star #:				Calvin L Griffin		
Witness		Staff	☑ ○	ther: Participant	1.2	ID #: Star #:				Deangelo McClaiı	n	
Victim		Inmate] ID #:					•	
Witness		Staff	<u> </u>	ther: Participant		Star #:				Christopher Hugh	nes	
Victim		Inmate		thou Bortisinost	1 2	ID #: Star #:						
☐ Witness ☐ Victim	_ 片	Staff Inmate	<u> </u>	ther: Participant		7				Lashaun Hogue		
Witness	H	Staff	Ø o	ther: Participant	1:					Anton Aseves		
☐ Victim		Inmate	<u> </u>		1	ID #:					·- ··	
Witness		Staff	V	ther: Participant		Star #:				Darrell Leverson		
Victim	_	Inmate	- 0	dhan Dadialaad] [] ID#:						
☐ Witness ☐ Victim		Staff Inmate	N O	ther: Participant		Star #:				Adolfo Zuniga		
Witness		Staff	☑ ○	ther: Participant		ID #: Star #:				Jamal Joyner		
Victim		Inmate] ID#:			a	,		,
Witness		Staff	☑ 0	ther: Participant		Star #:				Kenneth Brown		
Victim		Inmate	г л О	than Dartisinant		ID #: Star #:						
Witness	片	Staff Inmate	<u> </u>	ther: Participant		ID #:		<u> </u>		Pierre D White		
☐ Victim☐ Witness		Staff	∀ ○	ther: Participant	1.3	1D #: Star #:		_		Donnell Johnson		
☐ Victim		Inmate] ID#:						
Witness		Staff	☑ 0	ther: Participant		Star #:				Charles Hall	**	
Victim	=	Inmate	-			ID#:						
Witness		Staff	<u>N</u> 0	ther: Participant		Star #:		_		Michael Anderson	n	
☐ Victim☐ Witness		Inmate Staff	√ 0	ther: Participant	1:	ID #: Star #:				Jeremy Medina		
										Jerenny ivicuma		



COOK COUNTY SHERIFF'S OFFICE (OFICINA DEL SHERIFF DEL CONDADO DE COOK)

INMATE DISCIPLINARY REPORT (INFORME DISCIPLINARIO INTERNO)

v				
Victim	Inmate		D ID#:	_
Witness	☐ Staff	Other: Participant	Star #:	- Erik Norriega
Victim	Inmate	Cohon Dadisinost	☐ ID #:	
Witness	☐ Staff	Other: Participant		— Matthew Brown-Turner
☐ Victim☐ Witness	☐ Inmate	Other: Participant	☐ ID #:	- Harial Barrar
☐ Victim	Inmate	V Otto: Taraopant	□ ID#:	Uzziel Roman
Witness	Staff	Other: Participant	Star #:	— — Michael A Taylor
☐ Victim			□ ID#:	
☐ Witness	☐ Staff	Other: Participant	Star #:	
☐ Victim	Inmate		□ ID#:	
✓ Witness	☐ Staff	Other:	Star #:	– S HOWARD III
Victim	Inmate		□ ID#:	
☑ Witness	☐ Staff	Other:	Star #:	1 Defiction
Victim	Inmate		□ ID#:	
✓ Witness	Staff	Other:	Star #:	The state of the s
Victim	Inmate	Cothan	☐ ID #:	
Witness	Staff	Other:		- P WIIINANDA JI
☐ Victim ☑ Witness	∐ Inmate ☐ Staff	Other:	☐ ID #: ☐ Star #:	
☐ Victim	Inmate		□ ID#:	
✓ Witness	Staff	Other:	Star #:	
☐ Victim			□ ID#:	3311211744
☑ Witness	☐ Staff	Other:	Star #:	– M NEUMANN
☐ Victim	Inmate		□ ID#:	_
☑ Witness	☐ Staff	Other:	Star #:	- K DAVIS
☐ Victim	Inmate		D ID#:	_
☑ Witness	Staff	Other:	Star #:	
☐ Victim	Inmate		D#:	
Witness	☐ Staff	Other:	Star #:	- F Medina
☐ Victim	☐ Inmate	Other:	☐ ID #:	<u> </u>
Witness		П опет		L ANDERSON
☐ Victim ☑ Witness	☐ Inmate	Other:	☐ ID #:	– N ASKAR
☐ Victim	☐ Inmate		□ ID#:	- IN ASKAR
₩itness	☐ Staff	Other:	Star #:	– P MIRANDA Jr
☐ Victim	Inmate		□ ID#:	
✓ Witness	Staff	Other:	Star #:	B Devine
☐ Victim	Inmate		□ ID#:	_
✓ Witness	☐ Staff	Other:	Star #:	– G MAGEE
☐ Victim	Inmate		☐ ID #:	_
Witness	Staff	Other: Participant	Star #:	R ARCE
☐ Victim	Inmate	-	□ ID#:	_
Witness	Staff	Other:	Star #:	T CHRISTIE J
☐ Victim ☑ Witness	☐ Inmate	Other:	☐ ID #:	- N. FIGUED
☐ Victim	Inmate		□ ID#:	— N FISHER
☐ Victim ✓ Witness	☐ Inmate	Other:	Star #:	— D HENDRIX
				DILIDRIA

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COOK COUNTY SHERIFF'S OFFICE (OFICINA DEL SHERIFF DEL CONDADO DE COOK) INMATE DISCIPLINARY REPORT (INFORME DISCIPLINARIO INTERNO)

INFRACTION NARRATIVE (Infraccion narrativa)

Approximately 1015hrs on 08apr16, R/D Howard #17250 opened tier 3C in division 10, R/D observed detainee Roberson, Edward #20150212130 standing outside shower when he struck detainee Griffin ,Calvin #20120203207with closed fists, then multiple 10-10s (fight in progress) erupted on the deck, R/D radioed for support. Supervisors and extra officers responded entered the tier, giving verbal orders for all inmates to lay face down on the ground. A few inmates laid face down on the ground, but a group of inmates began to start fighting again between cells #3305 and #3306. Supervisors gave more verbal orders to stop fighting, none of the inmates complied to the verbal orders, oc was deployed in the direction of the fight. Once the oc was deployed, the inmates started to comply with the verbal orders. Inmates were handcuffed by officers and secured in there cells. Inmates that had injuries and oc sprayed were escorted off the tier for decontamination and medical treatment. Cells were searched and individuals before being returned to their cells.

and medical deathers. Cens were searched and mulviduals before being returned to their cens.								
Material Confiscated/Evidence Bag Number (Attach photocopy of evidence) Materials confiscados/pruebas bolsa numero (adjuntar fotocopia de pruebas):								
		CLASSIFICA	ATION UNIT					
Inter-Agency Health Inquiry Submitted: YES NO DNA	If YES, Date Submitted:	Assesment Complete	d: DNA If YES, where? Medical	Health Mental Heatlh	Assesment Received:			
Approved For Pre-Hearing Segregation: Placed in Pre-Hearing Segregation: If YES, Date/Time		NO DNA NO DNA ion:	Was Verbal Warning Issued: If Yes, Were Privileges Restricted Type of Priviledge adn Duration of Restriction					
Classification Unit Personnel (Print):			Title:	Star #				
Reporting Personnel's Name (Print): S HOWARD III		Star #	Signature:		Date:			
Reviewing Supervisor's Name (Print):		Star #	Signature:		Date:			
Watch Commander (Print):		Star #	Signature:		Date:			
Disciplinary Report Delivered to Inmate b	ογ (Print Name): (Informe α	disciplinario entregado al recluso	o por:)	Star Number: (Numero de estr	rella)			
Date Delivered: (Fecha de entrega:) 4/8/2016	Time Delivered: (Tiempo	o de entrega:)	Inmate's Signature: (Firma del Rec	luso:)				



COOK COUNTY SHERIFF'S OFFICE INMATE DISCIPLINARY REPORT - FINDINGS OF FACT AND DECISION

OFICINA DEL ALGUACIL DEL CONDADO DE COOK INFORME DISCIPLINARIO INTERNO — CONCLUSIONES DE HECHO Y DE DECISIÓN

		N (Información del recluso)	
Immate's Name (Print) (Nombre del recluso (Imprimir)):	1 ID # (Número de identificación):	Inmate's DOB (Fecha de nacimiento):	Sontrol Number (Numero de control):
Pate of Hearing (Fecha de audignoja);	mate Requested Witnesses (Recluso pidio a testigo	s): Waive 24 Hr. Notice (Renunciar a 24 horas de aviso):	Representative/Interpreter (Representante / Interprete)
4/2/16	☐ Yes (Si) ☐ No	☐ Yes (Si) ☐ No	Living Unit (Unidad de vida):
nmate Witness' (Reciuso testigo):	Living Unit (Unidad de vida):	Inmate Witness (Recluso testigo):	Civing that (critical de vida).
nmate Witness (Recluso testigo):	Living Unit (Unidad de vida):	Inmate Witness (Recluso testigo):	Living Unit (Unided de vide):
nmate's Plea to Charge (Motivo del recluso a cargo): Guitty as Charged (Culpable de los ca	argos) A Not Guilty (No culpable	Inmate's Status White Awaiting Hearing (Estado del n	actuso mientras espera audiencia):
nmate's Statement Regarding Infraction (Use continuation A Statement Regarding Infraction (Use continuation A Statement Regarding Infraction (Use continuation) Inmate's Signature (Firma del rectuso):	the hards	to a la intracción (Use rioja complementaria en caso micesario) TORINA TORIN	ligt hubb
	WITNESS STATEMEN	IT (Declaracion de testigo)	
It is the finding of the Disciplinary Hear Es la conclusión de la Junta de Audiencia Guilty as Charged	ing Board that: (Mark all that app Disciplinaria que (Marcar todo logo Not Guilty	RD (Disposición por la junta de au oly): ue aplique): valid Report	pired 🗅 8 Days Expired
1 //	(11	dos de la Junta de Audiencia Disciplinaria	se basan en lo sigulente):
ZV	ds the following action (Junta de /	Audiencia Disciplinaria recomienda las sig END DATE (Fecha de	
Narrative (Narrativa):			
Invalid.	erez menten	y inniles o	une.
Disciplinary Hearing Board Member's (FT)(6 / Signatu	(8) Date).	(1111)	inary Hearing Board Member's (Title / Signature / Date):
IF FOUND GUILTY OF THE SUPERINTENDENT/UNIT	DISCIPLINARY CHARGE(S), YOU FHEAD WILL RENDER A DECISI	J MAY APPEAL TO THE DIVISIONAL (ON IN WRITING WITHIN FIVE (5) DAY	INIT SUPERINTENDENT S OF RECEIVING THE APPEAL.

COOK COUNTY

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(Oficina del Alguacil del Condado de Cook)

CONTROL#

INMATE ID#

INMATE GRIEVANCE FORM (Formulario de Queja del Preso)	
! THIS SECTION IS TO BE COMPLETED BY INMATE SERVICES STAFF OF GRIEVANCE FORM PROCESSED AS: EMERGENCY GRIEVANCE	REFERRED TO: CERMAK HEALTH SERVICES SUPERINTENDENT: OTHER:
INMATE INFORMATION PRINT - INMATE LAST NAME (Apellido del Preso): BYOUN UNIT (Primer II) DIVISION (División): INMATE'S BRIEF SUMMARY OF THE COMP	
 there has been no response to the request or the response is deemed unsatisfa Only one (1) issue can be grieved per form. Un preso que desea llenar una queja, se le requiere que lo haga dentro de los 15 Las decisiones del Comité Disciplinario de los presos, no podrán ser cuestionadas 	ough the use of an Inmate Grievance Request/Response/Appeal Form. Ite may re-submit the grievance issue after 15 days to obtain a "Control Number" if actory.
DATE OF INCIDENT (Fecha Del Incidente) TIME OF INCIDENT (Hora Del Incidente) The writing my Grievance on The Court protect. I came out of my cell the my Classification of the court Stabled 3 times, once in my arm, once in Stabled 3 times, once in my arm, once in Stabled 3 times, once in my arm, once in Stabled 3 times, once in my arm, once in Stabled 3 times, once in my arm, once in Action That You are requesting, this section must be completed (Acción)	mist of the fight occurring I was invibuck and once in the back prot cause I had nothing to de with it. The (10's
To be protected better and to me and a safer environment	6 not let harm come + 6
DATE AND INITIAL TO ACCURATELY REFLECT (SI ELEGIDO PRESENTAR SU QUEJA MÁS DE 2 DÍAS ANTES QUE CUANDO LA ENTREGO Y LE I	NCE WRITING AND/OR DATING IT ORIGINALLY, YOU WILL BE ASKED TO REVISE THE THE DAY YOU CHOSE TO SUBMIT THE FORM. PUSO LA FECHA DESDE UN PRINCIPIO, ES NECESARIO QUE CAMBIE LA FECHA Y INCLUYA SUS UMITIR SU FORMA) INMATE SIGNATURE AND DATE: (Firma del Preso/Fecha):
SUPERINTENDENT/DIRECTOR/DESIGNEE OF A DIVISION/UNIT MUST REVIEW A AND EMERGENCY GRIEVANCES. IF THE INMATE GRIEVANCE IS OF A SERI CRW/PLATOON COUNSELOR (Print): SUPERINTENDENT/DIRECTOR/DESIGNEE (Print): SIGNATURE:	ND SIGN ALL GRIEVANCES ALLEGING STAFF USE OF FORCE, STAFF MISCONDUCT, DUS NATURE, THE SUPERINTENDENT MUST INITIATE IMMEDIATE ACTION. DATE CRW/PLATOON COUNSELOR RECIEVED: DATE REVIEWED:

Case: 1:16-cv-06126 Document #: 7 Filed: 08/04/16 Page	e 13 prospede to 44 men
COOK COUNTY SHERIFF'S OFFICE (Oficina del Alguacil del Condado de Cook) INMATE GRIEVANCE RESPONSE / APPEAL FORM (Petición de Queja del Preso / Respuesta / Forma de Apelación)	ORIÉVANCE NON-GRIEVANCE (REQUEST)
INMATE INFORMATION (Información del Preso) INMATE LAST NAME (Apellido del Preso): INMATE INFORMATION (Información del Preso) INMATE INFORMATION (Información del Preso)	D Number (* de identificación): 3-6622117
GRIEVANCE / NON-GRIEVANCE (REQUEST) REFERRAL ((EMERGENCY GRIEVANCES ARE THOSE INVOLVING AN IMMEDIATE THREAT TO THE WEL	
CRW / PLATOON COUNSELOR'S SUMMARY OF THE COMPLAINT:	to Rolled
CRW / PLATOON COUNSELOR REFERRED THIS GRIEVANCE / REQUEST TO (Example: Superinter Jent, Pengak ileahin services, Person RESPONSE BY PERSONNEL HANDLING REFERRAL:	DATE REFERRED /S / 16
PERSONNEL RESPONDING/TO PRIEMANCE (Print) SIGNATURE: DIV./J Superintendents of a division/unit must review all responses to grievances alleging staff use of force	e, staff misconduct and emergency grievances.
NON-GRIEVANCE (REQUEST) SUBJECT CODE (Check applicable box); GRIEVANCE SUBJECT CODE: NON-GRIEVANCE SUBJECT CODE:	DATE RESPONSE WAS RECEIVED. [Fecha en que la respuesta fue recibida]:
INMATE'S REQUEST FOR AN APPEAL (Solicitud de Apelaci	ón del Preso)
* To exhaust administrative remedies, appeals must be made within 14 days of the date * Las apelaciones tendrán que ser sometidas dentro de los 14 días; a partir que el pres todas las posibles respuestas administrativas DATE OF INMATE'S REQUEST FOR AN APPEAL: (Fecha de la solicitud del la apelacion del detenido): INMATE'S BASIS FOR AN APPEAL (Base del detenido para una apelacion): They put me apelacion: A Sofer envi	
ADMINISTRATOR / DESIGNEE'S ACCEPTANCE OF INMATE'S APPEAL? ¿ Apelación del detenido aceptada por el administrador o/su designado(a)? ADMINISTRATOR / DESIGNEE'S DECISION OR RECOMMENDATION (Decision o recomendación por perte del administrator o / su designa	Yes (Si) Opy of the part of th
ADMINISTRATOR / DESIGNEE (Administrator o / su Designado(a)): SIGNATURB (Fimpa del Administrator o / su Designado(a)) May by By Company (a)	DATE (Floha): 10 16 18 18 18 18 18 18 18 18 18 18 18 18 18
INMATE SCHATURE (Firma dol Preso): COLUMN DE LEUN JULY (FIRMA COPY - CRW / PLATO) FCN-48 (Rev. 09/14) WHITE COPY - PROGRAM SERVICES YELLOW COPY - CRW / PLATO	DATE INMATE RECEIVED APPEAL RESPONSE: Fecha en que estrese recibio respyesta a su apelacion): ON COUNSELOR PINK COPY - INMATE